



# SHASTA COUNTY

## WATER AGENCY

COUNTY OFFICE BUILDING  
1855 PLACER STREET  
REDDING, CA 96001  
(530) 225-5661  
FAX (530) 225-5667

PATRICK J. MINTURN  
CHIEF ENGINEER

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Delta Vision Draft  
650 Capitol Mall, 5th Floor  
Sacramento, CA 95814

Subject: Delta Vision Document - Second Draft

The second draft of the Delta Vision document shows great improvement over the first. The inclusion of water storage in the Vision is laudable. However, the second document remains largely mute on the topic of water rights, has moments that lack internal cohesion and basic understanding of the Delta, and, though it tries to appear reasonable, still refuses to acknowledge that water in the Delta is a zero-sum game.

The second draft states early on (page 3, lines 31-33) that the key to managing the Delta is "**separation of water for human uses from water for the ecosystem.**" Later statements confirm that this is what it sounds like - a peripheral canal. The water quality benefits to south-of-Delta water contractors on the CVP and SWP are obvious, but the document neglects to mention the corollary reduction in water supply reliability that will fall on north-of-Delta contractors - both on established beneficial use and on supplies that have been contracted but not yet established. Given the huge disparity in population and resources between the two regions, any statement that comes out of the Vision must contain strong protections for current north-of-Delta uses and a strengthening of the area of origin protections promised in Water Code Section 11460. Further, the peripheral canal cannot make contractors south-of-Delta into areas that are "conveniently supplied with water" from an area of origin.

The document states (beginning page 7, line 45), "... climate change makes it more and more difficult to sustain relatively constant conditions," but follows with a list of what a healthy Delta will contain (page 8, lines 15-28). A healthy Delta is a variable Delta, but the initial statement shows that the Vision continues to seek a "steady state" in terms of tidal influences. Variable salinity, in particular, is the key to a healthy Delta, but the continued focus on maintaining predictability in the system dooms the Vision.

The draft vision is peppered with acknowledgements that the Delta cannot continue to be all things to all people... and fish. It even boldly dispenses with consideration of returning the Delta to a pre-1850 state. But the Vision (box, page 4, lines 21-23) sees the Delta "as an effective

estuary, teeming with life... providing high quality water." If the Vision calls for a peripheral canal, this seems to accept the premise that a healthy Delta is variable: water can be released from upstream storage to emulate a "natural" flow regime and quality water will be removed before it enters the mixing zone. This should work well for the estuary. But there continue to be in-Delta uses that demand quality water, which is antithetical to a healthy Delta. There is no "co-equal" in a zero-sum game. Something has to give and deferring the decision of what that is to some future governance will further increase the conflict inherent in that decision. If you decide now, a litigant will not hold up the Delta Vision in court and say, "This document says that our uses are supposed to be co-equal. How is harming our use in favor of some other use co-equal?"

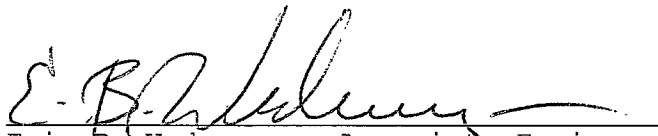
To sum up: CalFed proved that "getting better together" doesn't work, but further eroding the area of origin protections under California law is not acceptable either. Some proof needs to be provided that the Delta will live up to the Vision and that proof should not be internally inconsistent logic. And, not all Delta uses can be sustained; it is better to adopt a vision that clearly acknowledges that by making choices now.

Thank you for the opportunity to contribute to this important process.

Very truly yours,

Patrick J. Minturn, Chief Engineer

By:

  
Eric B. Wedemeyer, Associate Engineer  
Shasta County Water Agency

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